

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*,¹

Debtors.

)

) Chapter 11

)

) Case No. 23-11069 (CTG)

)

) (Jointly Administered)

)

) **Re: Docket No. 358**

**ORDER APPROVING THE JOINT STIPULATION BY
AND AMONG THE DEBTORS AND PAUL CLARK AND JEAN CLARK
TO (I) EXTEND THE DEADLINE TO RESPOND TO MOTION TO LIFT THE
AUTOMATIC STAY AND (II) EXTEND THE HEARING DATE RELATED THERETO**

Upon the *Certification of Counsel Regarding the Joint Stipulation By and Among the Debtors and Paul Clark and Jean Clark to (I) Extend the Deadline to Respond to Motion to Lift the Automatic Stay and (II) Extend the Hearing Date Related Thereto* (the “Certification of Counsel”) and the *Joint Stipulation By and Among the Debtors and Paul Clark and Jean Clark to (I) Extend the Deadline to Respond to Motion to Lift the Automatic Stay and (II) Extend the Hearing Date Related Thereto* (the “Stipulation”),² by and between the above-captioned debtors and debtors in possession (collectively, the “Debtors”) and Paul Clark and Jean Clark (the “Movants,” and together with the Debtors, the “Parties”), attached to this order (this “Order”) as **Exhibit 1**; and the district court having jurisdiction under 28 U.S.C. § 1334, which was referred to this Court under 28 U.S.C. § 157 pursuant to the *Amended Standing Order of Reference* from

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Stipulation.

the United States District Court for the District of Delaware, dated February 29, 2012; and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Stipulation in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having reviewed the Stipulation; and this Court having determined that the legal and factual bases set forth in the Stipulation establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Stipulation is approved.
2. The Stipulation shall be effective immediately upon entry of this Order.
3. The Response Deadline for the Debtors and all other parties in interest to respond to the Motion is extended through and including **October 12, 2023, at 4:00 p.m. (ET)**.
4. The Hearing Date for the Motion is extended through and including **October 16, 2023**, or such other date as may be suitable for the Court's docket.
5. The entry of this Stipulation and Order is without prejudice to any other party's right to respond to the Motion.
6. The Parties may mutually agree to further extensions of the response deadline and/or hearing date by filing a notice with the Court reflecting such extensions.
7. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order and to consummate the Stipulation.
8. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order and the Stipulation.

Exhibit 1

Stipulation

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*,¹

Debtors.

)

)

)

)

)

)

)

)

Chapter 11

Case No. 23-11069 (CTG)

(Jointly Administered)

Re: Docket No. 358

**JOINT STIPULATION BY AND AMONG
THE DEBTORS AND PAUL CLARK AND JEAN CLARK
TO (I) EXTEND THE DEADLINE TO RESPOND TO MOTION TO LIFT THE
AUTOMATIC STAY AND (II) EXTEND THE HEARING DATES RELATED THERETO**

This joint stipulation (“Stipulation”) is made and entered into by and among (a) the above-captioned debtors and debtors in possession (the “Debtors”)² and (b) Paul Clark and Jean Clark (the “Movants,” and together with the Debtors, the “Parties”). The Parties hereby stipulate and agree as follows:

RECITALS

WHEREAS, on August 6, 2023 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. These chapter 11 cases have been consolidated for procedural purposes only and are being jointly administered pursuant to Bankruptcy Rule 1015(b) [Docket No. 169]. The Debtors are managing their businesses and their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

² A detailed description of the Debtors and their businesses, including the facts and circumstances giving rise to the Debtors’ chapter 11 cases, is set forth in the *Declaration of Matthew A. Doheny, Chief Restructuring Officer of Yellow Corporation, in Support of the Debtors’ Chapter 11 Petitions and First Day Motions* [Docket No. 14] (the “First Day Declaration”).

On August 16, 2023, the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed an official committee of unsecured creditors [Docket No. 269] (the “Committee”). No trustee or examiner has been appointed in these chapter 11 cases;

WHEREAS, on August 29, 2023, the Movants filed the *Motion of Paul Clark and Jean Clark for Relief from the Automatic Stay to the Extent of Liability Insurance Proceeds* [Docket No. 358] (the “Motion”),¹ pursuant to which the deadline for filing a response was set for **September 12, 2023, at 4:00 p.m. (ET)** (the “Response Deadline”) and the hearing date for the Motion was set for **September 18, 2023, at 2:00 p.m. (ET)** (the “Hearing Date”); and

WHEREAS, the Parties have conferred and agreed to extend the Response Deadline for the Debtors and all other parties in interest to respond to the Motion to **October 12, 2023, at 4:00 p.m. (ET)**, and to extend the Hearing Date to **October 18, 2023**, or such other date as may be suitable for the Court’s docket.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, AND UPON APPROVAL BY THE BANKRUPTCY COURT OF THIS STIPULATION, IT IS SO ORDERED as follows:

1. The above recitals are incorporated by reference into this Stipulation with the same force and effect as if fully set forth hereinafter.
2. The Response Deadline for the Debtors and all other parties in interest to Respond to the Motion is extended through and including **October 12, 2023, at 4:00 p.m. (ET)**.
3. The Hearing Date for the Motion is extended through and including **October 18, 2023**, or such other date as may be suitable for the Court’s docket.
4. The Parties may mutually agree to further extensions of the response deadline and/or hearing date by filing a notice with the Court reflecting such extensions.

¹ Capitalized terms used but not immediately defined have the meanings given to them in the Motion.

5. Each of the Parties to this Stipulation represents and warrants it is duly authorized to enter into and be bound by this Stipulation.

6. This Stipulation is subject to the approval of the Court and shall be effective upon entry of an order approving this Stipulation by the Court (the “Order”). The Parties hereby consent to the entry of the Order and waive any right to notice or hearing on the approval of the Stipulation.

7. The Court retains exclusive jurisdiction with respect to any disputes arising from or other actions to interpret, administer, or enforce the terms and provisions of this Stipulation and the Order.

STIPULATED AND AGREED TO THIS 7TH DAY OF SEPTEMBER, 2023:

Dated: September 7, 2023
Wilmington, Delaware

/s/ Laura Davis Jones

Laura Davis Jones (DE Bar No. 2436)
Timothy P. Cairns (DE Bar No. 4228)
Peter J. Keane (DE Bar No. 5503)
Edward Corma (DE Bar No. 6718)

PACHULSKI STANG ZIEHL & JONES LLP

919 North Market Street, 17th Floor

P.O. Box 8705

Wilmington, Delaware 19801

Telephone: (302) 652-4100

Facsimile: (302) 652-4400

Email: ljones@pszjlaw.com
tcairns@pszjlaw.com
pkeane@pszjlaw.com
ecorma@pszjlaw.com

Patrick J. Nash Jr., P.C. (admitted *pro hac vice*)

David Seligman, P.C. (admitted *pro hac vice*)

Whitney Fogelberg (admitted *pro hac vice*)

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

300 North LaSalle

Chicago, Illinois 60654

Telephone: (312) 862-2000

Facsimile: (312) 862-2200

Email: patrick.nash@kirkland.com
david.seligman@kirkland.com
whitney.fogelberg@kirkland.com

-and-

Allyson B. Smith (admitted *pro hac vice*)

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

601 Lexington Avenue

New York, New York 10022

Telephone: (212) 446-4800

Facsimile: (212) 446-4900

Email: allyson.smith@kirkland.com

Proposed Co-Counsel for the Debtors and Debtors in Possession

/s/ Charles J. Brown III

Charles J. Brown III

**GELLERT SCALI BUSENKELL & BROWN,
LLC**

1201 N. Orange Street, Suite 300

Wilmington, DE 19801

(302) 425-5813

cbrown@gsbblaw.com

Counsel to Movants